

**EXHIBIT "D"**

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November 10, 2006

**Sent via Facsimile and U.S. Mail**

Darryl L. Jones, Esq.  
109 W. 6th Avenue  
Suite 200  
Anchorage, Alaska 99501

**RE: Purser vs. Boehm  
Case No. 05-CV-0085-JKS**

Dear Mr. Jones:

Enclosed please find Mr. Boehm's Second Set of Discovery Requests directed to your client via facsimile service and United States mail. In light of the Court's decision regarding liability there is now an obvious need to initiate an extensive amount of discovery including the taking of numerous depositions.

I assume that you will want to be present for the depositions of Defendant Williams in Mississippi and Defendant Bolling in Indiana. Furthermore, it will be necessary that you get yourself admitted into the Federal Prisons where they are currently being held. Our office is planning on taking your client's deposition the week of December 11, 2006 in Anchorage, Alaska. Please let me know your availability.

In addition it will be necessary that your client submit to a psychological evaluation with our expert Dr. Mark Mills as she has put her psychological and physiological well being at issue. Please let me know if you are agreeable or if a motion to the Court compelling her attendance will be necessary.

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***RE: Purser vs. Boehm***

I anticipate that we can work together scheduling all future discovery. Should you have any questions or concerns, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Brett A. Greenfield', with a stylized 'B' and a long horizontal stroke extending to the right.

Brett A. Greenfield

encs.

cc: Pam Sullivan, Esq.

cc: Client